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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re
Micha Star Liberty

Debtor.

Case No. 24-40401 WJL

Chapter 13

**STIPULATION TO CONTINUE
HEARING ON MOTION TO
EXTEND STAY TO NON-DEBTOR
DEFENDANTS TO LITIGATION**

Date: May 29, 2024

Time: 10:30 a.m.

Ctrm: 220

U.S. Bankruptcy Court
1300 Clay Street, 2nd Fl.
Oakland, California

Micha Liberty, Debtor, and Lisa Bloom and The Bloom Firm (“Creditors” or “Bloom”), by
and through their respective counsel, hereby stipulate as follows:

1. On March 22, 2024 the Debtor filed this Chapter 13 bankruptcy.
2. On April 3, 2024, Debtor filed a Motion to Extend the Stay to Non-Debtor Defendants to Litigation, which was originally set for hearing on April 17, 2024 and was continued by this Court to May 8, 2024. The parties began settlement negotiations and stipulated to continue the hearing to May 29, 2024.
3. The parties are still currently in settlement negotiations and have agreed that Debtor shall continue this hearing and Bloom will take no actions in the two pending state court actions; a

1 fraudulent conveyance action entitled *The Bloom Firm, a Professional Corporation vs. Michael*
2 *Star Liberty, an individual, Liberty Law Office, Inc., Liberty Law, Inc., and Linda Culler, Trustee*
3 *of Rising Start Trust dated October 15, 2015* filed as case 23CV047497 in the Alameda County
4 Superior Court (the “FT SCA”) and post-judgment collection on a judgment entered in a
5 declaratory relief action entitled *Micha Star Liberty, an individual; and Liberty Law Office, Inc.*
6 *vs. Lisa Bloom and The Bloom Firm* filed as case HG20079536 in the Alameda County Superior
7 Court (the “Dec Relief SCA”) until the continued hearing date or such time as either party
8 provides notice that settlement is futile.

9 4. The parties stipulate that the hearing scheduled for May 29, 2024 at 10:30 a.m.
10 shall be continued to June 12, 2024 to allow parties time to continue settlement negotiations.

11 Dated: May 28, 2024

KORNFIELD, NYBERG, BENDES, KUHNER,
LITTLE P.C.

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14 By: /s/ SARAH LAMPI LITTLE
15 (Bar No. 215635)
16 Attorneys for Debtor

17 Dated: May 28, 2024

CHORA YOUNG AND MANASSERIAN LLP

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19 By: /s/ Kevin Ronk
20 Kevin Ronk
21 Attorneys for Creditor
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